

ZMO LAW PLLC

Via ECF and email

Granted.
So ordered.
12/4/2023

December 4, 2023

Hon. J. Paul Oetken
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007



J. PAUL OETKEN
United States District Judge

RE: *United States v. Esteven Joaquin*, 22 Cr. 293 (JPO)

Dear Judge Oetken:

This office represents Esteven Joaquin in the above-captioned matter. We write to request a two-day extension on our time to file a sentencing memorandum. Our memorandum is currently due today, December 4, 2023. We are requesting that we be allowed to file on December 6, 2023, with the government having a corresponding extension of two days to file their motions.

We are requesting this extension as we received the report from our mitigation specialist, Kathleen O'Boyle, on Saturday, December 3, 2023. Ms. O'Boyle had received several key records only recently, delaying her finalization of her report. Thus, we are asking for a short extension to incorporate the mitigation specialists' report and finalize our sentencing memorandum.

However, Mr. Joaquin is eager to be sentenced as scheduled, and we'd ask that the date for sentencing remain the same. The government has consented to this proposed schedule.

Thank you for your attention to this case.

Very truly yours,



Tess M. Cohen

Tess M. Cohen
Partner

CC: AUSA Sarah L. Kushner, AUSA Kevin Mead, AUSA Ashley Nicolas